

# FLYNN & WIETZKE, P.C.

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November 6, 2024

Hon. Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: TYRONE COWARD V. AMTRAK  
24 Civ. 7562 (BMC)

Dear Judge Cogan:

We represent plaintiff in the above-referenced matter and submit this letter in response to the Court's Order to Show Cause issued on October 30, 2024.

Upon information and belief, the sole member of defendant Second Street Leasing LLC ("Second Street") is Mr. Matthew Zaloumis. Attached hereto is a copy of the Articles of Organization for Second Street. Subsequent filings with the Connecticut Secretary of State continue to show Mr. Zaloumis as the managing member and/or agent. In an effort to obtain more information as to the members of Second Street, we spoke with a representative of its insurance carrier, Liberty Mutual Insurance. The representative believed that Mr. Zaloumis was the sole member but could not provide any other documentation to establish the fact.

Based upon the filings with the State of Connecticut, it appears that Mr. Zaloumis maintains a residence at 6 Bonnie Lane, Oxford, CT 06478. We are prepared to amend the complaint and properly plead citizenship of Second Street Leasing LLC. As Mr. Zaloumis is a resident of Connecticut, diversity jurisdiction remains. Attached hereto is the proposed Second Amended Complaint.

Plaintiff is withdrawing any claim of supplemental jurisdiction over Second Street.

We hope that his satisfies the Court's Order to Show Cause

Respectfully submitted,

A handwritten signature consisting of two stylized letters, possibly 'S' and 'C', written in black ink.

Sean Constable

SC:EF